

Title VI Equity Analysis

King County Metro Paid Permit Parking Program

Introduction

King County Metro (Metro) is expanding its current parking permit program to include paid permits for single-occupancy vehicles (SOVs) in addition to the free permits for high occupancy vehicles (HOVs – with two or more occupants per vehicle) currently offered at Metro park and ride facilities.

Currently, transit customers who wish to drive and park a vehicle to access fixed-route transit, or join a carpool or vanpool are faced with very crowded conditions at many of Metro's park and ride facilities. Travelers who have schedule flexibility arrive earlier and earlier to find a space, resulting in crowding on early transit runs serving the most popular park and ride lots. Transit customers who are unable to arrive earlier may be prevented from accessing their nearest park and ride facility altogether. Metro facilities are also used by non-transit customers, which is prohibited by policy but difficult to enforce without a mechanism for transit customer validation, which the permit program provides.

King County is proposing this new, fee-based parking permit program to help achieve six parking management objectives adopted by the King County Council in fall 2018 (Ordinance #18837):

- Encourage use of transit
- Increase ridership in the region
- Spread peak-of-peak demand for transit
- Increase use of carpooling
- Improve access to transit parking for low-income populations, communities of color, immigrants and refugees, limited English-speaking populations, transit-dependent populations, individuals who work nontraditional schedules or during off-peak travel periods and other transit riders
- Cover program costs

Ordinance #18837 also granted the general authority for Metro to charge for use of its park and ride facilities, but specified that pricing and other permit program elements be established through a public rulemaking process overseen by Metro's General Manager.

The permit program, as proposed, would be implemented at lots consistently at or above 90% occupancy. Lots currently identified for permit implementation are: Issaquah Highlands Park & Ride, Redmond Park & Ride, Northgate Transit Center Park & Ride, South Kirkland Park & Ride, Tukwila Park & Ride, Aurora Village Park & Ride, Kenmore Park & Ride, Bear Creek Park & Ride, Bothell Park & Ride, and Shoreline Park & Ride.

During the weekday morning peak travel periods a portion of the parking in participating lots - not to exceed 50% of the total capacity - would be designated for permit parking. Transit customers could apply for a free HOV permit, or paid SOV permit. A valid HOV or SOV permit would allow transit customers access to these reserved parking areas anytime during the morning peak. All other parking in participating lots would be available at all times for free on a first-come, first served basis for general transit parking; at the end of the morning peak and on weekends, unused permitted spaces would become available for general transit parking as well.

Metro Policy

Although parking permit fees are not considered transit fares requiring a service and fare equity (SAFE) analysis when changed, Metro has opted to perform the equivalent of a SAFE analysis to understand the equity effects of the program's proposed pricing approach.

Because permit fees, even under a strictly opt-in program as proposed, would impose an additional cost on a specific group of transit riders, for the purposes of this analysis Metro is considering the impact of the total cost change to affected riders by comparing the cost of a monthly transit pass alone, with the combined cost of a monthly transit pass plus monthly permit fees. If any disparate impact on minority populations, or disproportionate burden on low-income populations is found, Metro will consider steps to avoid, minimize, or mitigate adverse impacts and reanalyze the modified changes to determine if the impacts are removed or lessened.

In Metro's 2015 Service Guidelines, Metro defines these impacts as follows:

A disparate impact "...results in adverse effects that are significantly greater for minority populations than for non-minority populations."

A disproportionate burden "...results in adverse effects that are significantly greater for low-income populations than for non-low-income populations"

(<http://metro.kingcounty.gov/planning/pdf/2011-21/2015/metro-service-guidelines-042816.pdf>, page 33, Ordinance 18301)

These definitions are derived from Federal Transit Administration (FTA) Circular 4702.1B, which outlines the requirements and guidelines under Title VI of the 1964 Civil Rights Act for transit agencies that receive federal funding to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.

Definitions & Data Sources

The share of park and ride users identified as low-income or minority in this analysis is drawn from a license plate survey conducted by Metro in 2017. Metro estimated the number of low income and minority individuals using household income and race statistics from the 2017 American Community Survey for census tracts where vehicles observed using the facility were registered, weighted by the

number of vehicles originating in each of those tracts. For the purposes of this analysis, low-income is defined as at or below 200% of the federal poverty level, as shown in Table 1 below.

Table 1. Low income definition

Persons in family/household	Federal Poverty guideline	200% poverty level (Metro Low Income Definition)
1	\$11,770	\$23,540
2	\$15,930	\$31,860
3	\$20,090	\$40,180
4	\$24,250	\$48,500
5	\$28,410	\$56,820
6	\$32,570	\$65,140
7	\$36,730	\$73,460
8	\$40,890	\$81,780

Demographic analysis

Table 2 compares the percentage of park and ride users who are minority or low-income (i.e. those who would potentially face a disparate impact or disproportionate burden by the introduction of fee-based parking permits) with the percentage of all residents in King County who are minority or low-income.

Table 2. Permit fee impacts on minority and low income riders vs. all riders

	King County	King County Park and Ride Users
% minority	33%	21%
% low-income	22%	15%

The percentages of Metro park and ride users who are minority or low-income are lower than the percentage of King County Residents who are minority and low-income. Thus, based on an analysis of the demographic composition of potentially impacted transit customers (per standard Title VI analysis methodology), the introduction of paid permits has no disparate impacts on minority populations or disproportionate burden on low-income populations.

However to further analyze the distributional impacts of financial burden, Metro next examined the difference in total cost impact on low-income vs. non-low-income riders *within* the population of parking users.

Fee Change Proposal

A review of market data showed that public and private parking operators of parking facilities in the immediate vicinity of high-demand transit parking facilities in the region have an average monthly rate of \$90. From this starting point, Metro adjusted up or down on a per-facility basis, taking into account lot occupancy, level of transit service and location within a transit corridor. The result is a three-tiered permit pricing proposal with monthly rates at \$60/month, \$90/month or \$120/month. These rates are considered in the equity analysis below. To represent the full cost of transit use, permit costs are added to the cost of a monthly bus pass for full-fare adult passengers, and for low-income adult passengers (using ORCA LIFT, Metro's low-income fare).

Table 3. Differential impact on low-income riders of pricing permits at \$60/month, \$90/month and \$120/month

Customer	Current (without paid permit parking)			With \$60/month paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$60	\$159	61%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$60	\$114	111%

Customer	Current (without paid permit parking)			With \$90/month paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$90	\$189	91%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$90	\$144	167%

Customer	Current (without paid permit parking)			With \$120/month paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$120	\$219	121%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$120	\$174	222%

The cost of a monthly transit pass is lower for low-income customers who qualify for discounted transit fares under the ORCA-LIFT program available to riders with annual household income at or below 200% of federal poverty level. As a result, applying an additional cost for a permit fee to both low-income and non-low-income riders results in a higher percentage increase in overall cost of transit use for low-income riders/parking users than for non-low-income riders/parking users, potentially creating a disproportionate burden on the low-income riders.

Avoiding the disproportionate burden

This disproportionate burden (in percentage terms) of a parking fee on low-income riders can be avoided if the pricing for parking permits includes a discount for low-income riders equal to or greater than the percentage discount they receive for transit passes. Thus, Metro is proposing a \$20 flat parking permit fee for low-income customers (shown in the table below) which, depending on location is discounted between 67% and 83% from the full priced permit of \$60-\$120; this exceeds the discount low-income riders receive for transit passes.

Table 4. Equalizing the impacts on low-income riders with low-income permit pricing discount

Customer	Current (without paid permit parking)			With \$60/month standard and \$20/month discounted paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$60	\$159	61%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$20	\$74	37%

Customer	Current (without paid permit parking)			With \$90/month standard and \$20/month discounted paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$90	\$189	91%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$20	\$74	37%

Customer	Current (without paid permit parking)			With \$120/month standard and \$20/month discounted paid permit parking			Change
	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Monthly transit pass	Monthly permit fee	Total monthly transit cost	Percent change in total transit costs
Full fare	\$99	NA	\$99	\$99	\$120	\$219	121%
Low-income (LIFT) fare	\$54	NA	\$54	\$54	\$20	\$74	37%

To fully avoid any disproportionate burden on low-income populations, Metro’s pricing proposal includes the \$20 flat price for low-income customers described above. In addition, the enabling legislation adopted by the King County Council in fall 2018 anticipates that Metro may work to adjust prices in the future, but specifies that low-income customers may purchase permits at a rate discounted at least 70% from the prices charged to full-fare transit customers.

Conclusion

The proposal to make available fee-based paid parking permits to single-occupancy users of Metro park and ride facilities, including pricing discounts for low-income customers, creates no disparate impacts on minority populations nor disproportionate burdens on low-income populations.